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3                   **UNITED STATES DISTRICT COURT**  
4                   **NORTHERN DISTRICT OF CALIFORNIA**

5                  CHASOM BROWN, WILLIAM BYATT,  
6                  JEREMY DAVIS, CHRISTOPHER  
7                  CASTILLO, and MONIQUE TRUJILLO  
8                  individually and on behalf of all other similarly  
9                  situated,

10                 Plaintiffs,  
11                 v.

12                 GOOGLE LLC,  
13                 Defendant.

14                 Case No.: 4:20-cv-03664-YGR-SVK

15                 **DECLARATION OF ALEXANDER**  
16                 **FRAWLEY ISO PLAINTIFFS' MOTION**  
17                 **TO CLARIFY**

18                 Judge: Hon. Yvonne Gonzalez Rogers  
19                 Date: February 28, 2023  
20                 Time: 2:00 p.m.  
21                 Location: Courtroom 1 – 4th Floor

## **DECLARATION OF ALEXANDER FRAWLEY**

I, Alexander Frawley, declare as follows.

1. I am an associate with the law firm of Susman Godfrey LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of New York and admitted *pro hac vice* for this case. I have personal knowledge of the matters set forth herein and am competent to testify.

2. On January 6, 2023, I participated in a meet and confer with counsel for Google regarding Plaintiffs' motion for clarification. I asked if Google would consent to the relief that Plaintiffs seek. Google has not yet consented.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of January, 2023, at New York, New York.

/s/ Alexander Frawley